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February 10, 2022

**BY ECF**

Hon. Paul G. Gardephe, District Judge  
United States District Court for the  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States v. Kourtnei Williams*, 19 Cr. 789 (PGG).

Dear Judge Gardephe:

On December 16, 2021, the Court sentenced my client, Kourtnei Williams, to six months' incarceration, and ordered that she surrender to begin serving her sentence on February 16, 2022. I respectfully request a 60-day extension of Ms. Williams' time to surrender, so that she can begin serving the sentence on April 15<sup>th</sup>. I have spoken with A.U.S.A. Louis Pellegrino, who consents to this application on behalf of the government.

As the Court may recall, Ms. Williams is the main care provider for her mother, Judy Horn-Berte, who is disabled. On about January 25<sup>th</sup>, they were served with an eviction notice and 90-day termination of their lease for failure to make rent payments. (The Court may also recall the dire financial straits in which she and her family find themselves, as the result of Ms. Williams losing her job due to her involvement in this offense.)

Ms. Williams and her mother have an interview with Homebase, part of New York City's Human Resources Administration, on February 15th. According to their website, "Homebase provides New Yorkers experiencing housing instability with various homeless prevention services and aftercare services to families and individuals exiting NYC DHS shelter to permanent housing." *See*, <https://www1.nyc.gov/site/hra/help/homebase.page> (last visited Feb 10, 2022).

Homebase may be able to help Ms. Williams and Ms. Horn-Berte pay the rent arrears, in which case they would try to negotiate with the landlord to remain in their apartment, or help

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them obtain Section 8 housing. If Homebase is not able to help them, Ms. Williams and her mother will seek legal assistance from Legal Aid to see if they have other options, but they have delayed doing this until after the Homebase meeting, as it may be unnecessary, depending on the outcome of the meeting.

Ms. Williams requests a delay in surrendering so that she can help her mother deal with this situation, which may include helping her to move to other housing.

Thank you for your attention to this application.

Very truly yours,

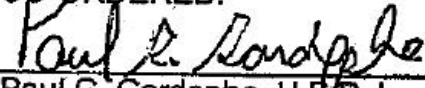
**MEMO ENDORSED**

/s

**The Application is granted.**

Jesse M. Siegel

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** February 10, 2022